



GE Aircraft Engines

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U.S. Department of Transportation Dockets
Docket No. [FAA-2004-17168]
400 Seventh Street, S.W.
Nassif Building
Room PL-401
Washington, D.C. 20590-001

cc: Jay Pardee, Manager
Engine & Propeller Directorate,
ANE-100
Federal Aviation Administration
12 New England Executive Park
Burlington, MA 01803

Dear Madam/Sir:

In March 1993, the Parts and Production Certification Working Groups of the Aviation Rulemaking Advisory Council (ARAC) were established to make recommendations to the Federal Aviation Administration (FAA) concerning the need for new or revised rules governing Parts Manufacturer Approvals (PMA). The industry, including Type Certificate Holders and PMA Approval Holders, came together via these Working Groups to create recommendations for improvements to PMA regulations in 14 CFR Parts 21 and 45. GE Aircraft Engines has been an active participant in these Working Groups. The ARAC concluded that changes to these Parts were necessary to ensure the safe growth of the aviation industry.

In February 1999, following six years of discussion, debate and more than one million dollars in combined industry expenditure, the FAA was presented with the ARAC recommendation for proposed changes to 14 CFR Parts 21 and 45 via a 158 page draft Notice of Proposed Rulemaking (NPRM). The ARAC attempted to address many, but not all, of the issues that were prevalent at the time of the draft NPRM submission to the FAA. While not perfect, the draft NPRM is considered to be the industry's consolidated recognition that regulatory change is needed and is a major first step in enhancing aviation safety on this issue.

As of May 2004, the ARAC-drafted NPRM, and any subsequent FAA revision(s), continues to be discussed within the FAA and there is no known timetable for issuance of this, or any, NPRM regarding 14 CFR Parts 21 and 45. As the aviation industry continues to evolve, it should be an imperative to ensure that regulations reflect current practices and changes in the industry environment. Five years ago, the industry took the first in a series of needed steps to ensure that needed changes to current PMA regulations were highlighted. Further delay by the FAA in addressing these proposed changes could not be viewed as in the best interest of the flying public.

GE Aircraft Engines therefore respectfully requests the FAA submit the most recent revision of the ARAC-drafted NPRM for public comment as soon as possible. The duration of the comment period should be commensurate with amount of changes made by the FAA to the ARAC-draft NPRM since January 1999.

Respectfully,

Jan Schilling
Chief Engineer and General Manager
GE Aircraft Engines/GE Transportation